

# **EXHIBIT F**

# Morgan Lewis

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August 21, 2017

**VIA EMAIL**

Benjamin Galdston, Esq.  
Lucas R. Gilmore, Esq.  
Bernstein Litowitz Berger & Grossmann LLP  
12481 High Bluff Drive, Suite 300  
San Diego, CA 92130

Re: *BlackRock Core Bond Portfolio v.*  
*Deutsche Bank Nat'l Trust Co.*, No. 14-cv-9367 (S.D.N.Y.)

Dear Ben and Lucas:

As you know, we represent defendants Deutsche Bank National Trust Company ("DBNTC") and Deutsche Bank Trust Company Americas, solely as trustees (the "Trustees"), in the above-referenced case.

We write concerning the continuing saga of Plaintiffs' inadequate responses to "The Third Set Of Interrogatories To Plaintiffs By Deutsche Bank National Trust Company, As Trustee," dated January 15, 2016 (the "Third Set Of Interrogatories"), and, specifically, Plaintiffs' responses to Interrogatory Nos. 8 and 9, which sought information about and evidence supporting Plaintiffs' alleged transactions in the RMBS at issue in this case. As you know, Plaintiffs responded to those interrogatories, in part, by providing information about the alleged transactions in appendices, one for each Plaintiff group (the "Appendices," each an "Appendix"). Plaintiffs have attempted to correct the obvious errors and omissions in these Appendices at least three times. Amazingly, there are still errors and omissions with respect to both the information contained in the Appendices and the purported "source" documents that purportedly evidence the alleged transactions. The errors and omissions are reflected on the attached chart (for Plaintiff PIMCO) and marked Appendices (for other plaintiff groups), notated as to each type of particular error and/or omission that pertains to each alleged transaction on the chart. See Exh. "A" (notating the errors and/or omissions of PIMCO Plaintiffs); Exh. "B" (notating the errors and/or omissions of AEGON Plaintiffs); Exh. "C" (notating the errors and/or omissions of DZ Bank Plaintiffs); and Exh. "D" (notating the errors and/or omissions of Prudential Plaintiffs). We provide specific examples of these types of errors and omissions below, and request that

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Plaintiffs remedy the errors and omissions no later than Friday, August 25th.

First, for example, the “source” documents that are supposed to provide the evidence that supports Plaintiffs’ alleged transactions in the RMBS at issue are nothing more than documents that Plaintiffs themselves generated internally (the so-called “Trade Memoranda”). Please produce broker confirmations for all transactions at issue herein, for both alleged purchases and sales.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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We request that you correct any errors or omissions on the Appendices and produce any missing "source" documents for any of the alleged transactions by Friday, August 25th.

Very truly yours,

A handwritten signature in cursive script that reads "Bernard J. Garbutt III" followed by a large, stylized "JW" monogram.

Bernard J. Garbutt III

cc: Blair Nicholas, Esq.  
Timothy DeLange, Esq.  
Brett Middleton, Esq.  
Rollin Chippey, II, Esq.  
Elizabeth Frohlich, Esq.  
Grant MacQueen, Esq.  
Jamie Whittenburg, Esq.

# EXHIBIT A

Purported Source Document	Corresponding Row on PIMCO's 2017.06.05 Revised Appendix	Date Error?	Portfolio ID Error?	Wrong/Unidentified Purchase Counterparty?	Original Face Purchased Error?	Price Error?	CUSIP/Trust ID	No Errors
1576008	1							👍
34059275	2		✓					
1576006	2	✓			✓	✓		
34059274	3	✓	✓		✓	✓		
34059276	3		✓					
1575876	4							👍
1576028	5		✓					
1576037	6							👍
1575934	7							👍
1575934	8		✓		✓			
1576026	8	✓				✓		
1575934	9							👍
1575934	10							👍
1575934	11							👍
1576040	12							👍
1576035	13							👍
1575984	14							👍
1576036	15							👍
1576003	16							👍
1576011	17							👍
1575894	18							👍
1575992	19							👍
1575908	20							👍
34059277	21	✓	✓			✓		
34059278	21		✓					
1575877	21	✓		✓		✓		
1575931	22			✓				
1575931	23			✓				
1575922	24							👍
1575931	25			✓	✓			
1575922	26				✓			

1575931	27			✓				
1575922	28							👍
1575931	29			✓				
1575922	30							👍
1575931	31			✓				
1575931	32			✓				
1575982	33		✓					
1575921	34		✓		✓			
1575914	35	✓			✓			
1575905	36	✓	✓	✓	✓	✓		
1575913	37							👍
1575905	38			✓				
1575921	39		✓	✓	✓			
1575914	40				✓			
1575904	41							👍
1576030	42							👍
1576039	43							👍
1575930	44							👍
1575956	45							👍
1575926	46							👍
1575997	47							👍
1575912	48							👍
1575926	49							👍
1575930	50		✓		✓			
1575967	50	✓		✓	✓	✓		
1575956	51		✓					
1575967	51	✓		✓	✓	✓		
1575957	52		✓		✓			
1575967	52	✓		✓	✓	✓		
1575911	53		✓					
1575967	53	✓		✓	✓	✓		
1575958	54		✓		✓			
1575930	55		✓		✓			
1575912	56		✓		✓			

1575956	57								👍
1575958	58								👍
1575912	59		✓		✓				
1575926	60								👍
1575956	61								👍
1575926	62								👍
1576032	63								👍
1575929	64								👍
1575902	65			✓					
1575958	66		✓		✓				
1576013	67								👍
34059281	68	✓	✓	✓	✓	✓			
34059282	68		✓						
1575989	68	✓		✓	✓	✓			
34059280	69		✓						
34059281	69	✓	✓	✓	✓	✓			
1575989	69	✓		✓	✓	✓			
34059279	70		✓						
34059281	70	✓	✓	✓	✓	✓			
1575989	70	✓		✓	✓	✓			
1575949	71								👍
34059283	72		✓						
34059284	72	✓	✓	✓		✓			
1576002	72	✓		✓		✓			
34059285	73	✓	✓	✓	✓	✓			
34059286	73			✓	✓				
1576027	73	✓		✓	✓	✓			
1575975	74		✓		✓				
1575975	75		✓		✓				
1575975	76		✓		✓				
1575975	77		✓		✓				
1575975	78		✓		✓				
1575975	79		✓		✓				
1575882	80								👍

1575978	81							👍
1575881	82	✓		✓		✓		
1575977	82		✓		✓			
1576023	83							👍
1575977	84		✓		✓			
1575977	85							👍
1575977	86		✓		✓			
1575977	87							👍
1575977	88		✓		✓			
1575977	89		✓		✓			
1575983	89	✓		✓		✓		
34059246	90	✓	✓	✓		✓		
1575879	90	✓		✓		✓		
34059248	91	✓	✓	✓		✓		
34059250	91		✓					
1575880	91	✓		✓		✓		
1575977	92		✓		✓			
1575977	93							👍
1575941	94							👍
1575891	95							👍
1575953	96	✓		✓		✓		
1575971	96	✓	✓		✓			
1576018	97			✓				
1575971	98							👍
1575971	99							
1575971	100							
1575971	101							
1576023	102			✓	✓		✓	
1575971	103	✓	✓		✓			
1576016	104							👍
34059254	105	✓	✓	✓		✓		
34059255	105	✓	✓	✓		✓		
1576023	105		✓		✓			
1575961	106							👍

1575961	107								👍
1575887	108								👍
1575901	109								👍
1575996	110								👍
1575898	111								👍
1575898	112								👍
1575898	113								👍
34059257	114		✓						
34059258	114	✓	✓	✓		✓			
1575895	114	✓		✓		✓			
34059259	115	✓	✓	✓		✓			
34059260	115		✓						
1575986	115	✓		✓		✓			
1576017	116								👍
1576017	117								👍
1575886	118			✓					
1575883	119								👍
1575985	120								👍
1575994	121								👍
1575885	122								👍
1576024	123								👍
1575932	124								👍
1576005	125								👍
1575932	126								👍
1576005	127								👍
1575932	128								👍
1575932	129								👍
1575988	130			✓					
1575998	131	✓			✓				
1575909	132								👍
1575909	133								👍
1575909	134								👍
1576007	135								👍
1575969	136								👍

1575969	137								👍
1575990	138	✓							
1576029	139								👍
1575947	140								👍
1576010	141								👍
1575900	142								👍
1575955	143								👍
1575944	144								👍
1576038	145								👍
1575918	146								👍
1575959	147								👍
1575945	148								👍
1575936	149								👍
1575899	150								👍
1575899	151								👍
1575940	152								👍
1576031	153								👍
1575899	154								👍
1575884	155								👍
1575991	156								👍
1575923	157								👍
34059261	158		✓		✓				
34059262	158	✓	✓	✓		✓			
34059264	158	✓	✓	✓	✓	✓			
1575963	158	✓		✓		✓			
1575893	159								👍
1576021	160								👍
1575888	161								👍
34059242	162	✓							
1575952	163								👍
1575935	164	✓							
1575892	165								👍
1576000	166								👍
34059265	167		✓						

34059267	167	✓	✓	✓		✓		
1576009	167	✓		✓		✓		
1576041	168							👍
1575946	169							👍
1575954	170							👍
34059244	171			✓	✓	✓		
34059268	172	✓	✓		✓	✓		
34059269	172		✓	✓				
1576004	172			✓				
1575889	173							👍
1576012	174							👍
1576012	175							👍
34059271	176	✓	✓			✓		
34059272	176		✓	✓				
1575999	176			✓				
1575924	177							👍
1575924	178							👍
1575924	179							👍
1575924	180							👍
1575924	181							👍
1575942	182							👍
1575928	183							👍
1575928	184							👍
1575907	185							👍
1575907	186							👍
1575950	187			✓				
1575917	188							👍
1575917	189		✓		✓			
1575917	190							👍
1575890	191							👍
1575943	192							👍
1575925	193							👍
1575927	194							👍
1575927	195							👍

1575927	196								👍
1575938	197								👍
1575927	198								👍
1576022	199			✓					
1575973	200								👍
1575897	201								👍
1575973	202								👍
1576033	203								👍
34059243	204					✓			
1575951	205								👍
1576034	206								👍
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1575987	208								👍
1575933	209								👍
1576025	210								👍
1575933	211								👍
1575933	212								👍
1575993	213	✓							
1575933	214								👍
1575933	215								👍
1575896	216								👍
1576001	217								👍
1575919	218								👍
1575919	219								👍
1575948	220								👍
1576014	221			✓					
1576020	222								👍
1576014	223			✓					
1576020	224								👍
1575910	225								👍
1575910	226								👍
1575915	227			✓					
1575915	228			✓					
1575915	229			✓					

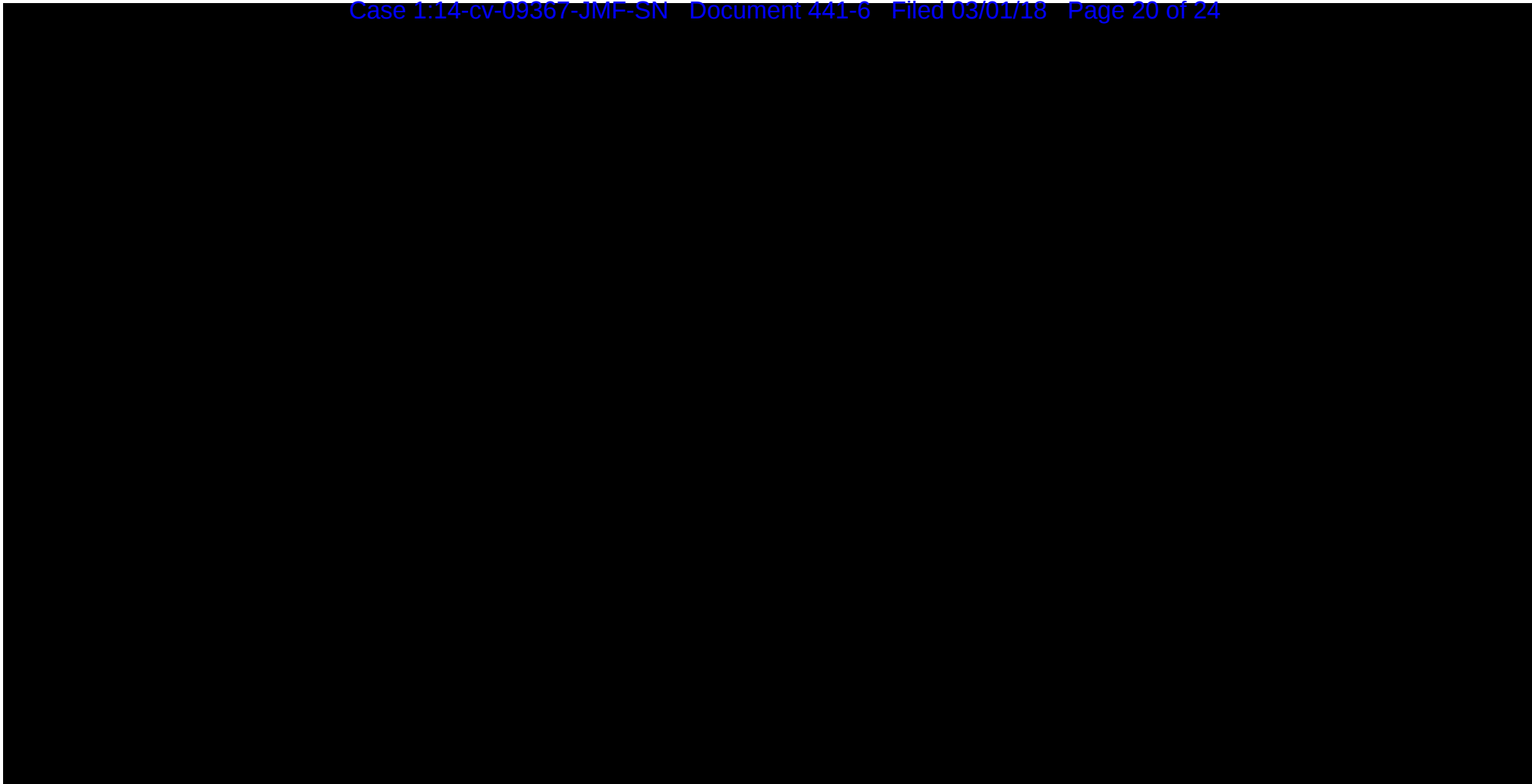
1575995	230							
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# EXHIBIT B





# EXHIBIT C



# EXHIBIT D





